

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	RM-10805,
)	RM-10806,
The Amateur Radio Service:)	RM-10807,
Proposed Changes to the Morse Code (CW))	RM-10808,
Proficiency Requirement for Operator)	RM-10809,
Access to the Amateur Radio Bands)	RM-10810,
Below 30 MHz.)	RM-10811

COMMENTS TO PETITIONS FOR RULEMAKING

Radio in the early days was by Morse code and amateurs were recruited during both World War I and World War II to serve as radio operators, electronics technicians and Utilized in research. After World War II, amateur radio was authorized to begin Operations and as such the military still taught radiomen Morse code. Today, the military no longer teaches Morse code.

As a retired Navy Classification/Interviewer we had to administer two specific tests to those who were to be sent to foreign language training and to radioman training. Those who passed were sent to their respective schools. Morse code is like a foreign language in that it takes someone who can learn. Not everyone is capable of learning due to a variety of reasons be it tone deaf or other special circumstances.

Petitions RM-10805, RM-10806, RM-10807, RM-10808, RM-10809, RM-10810 and RM-10811 requests the Commission to do away with, modify or retain Morse code and increase code speed for some classes of license.

Since Morse code can be classified as nothing more than another mode of communication e.g. SSB, Packet, PSK31 or ATV; since the military no longer trains Morse code (which was once the primary reason for the code other than in the beginning the only means of communications) and the ability to send/receive code DO NOT reflect the competence of the individual amateur radio licensee.

Some of the petitioners would have the Commission remove the subbands specifically set aside for CW and is utilized by various digital means of communications and should be preserved.

Other petitioners would have the commission increase the code requirement for other classes of license, which would not be consistent with international law due to the removal of code.

The amateur radio community losses large number of applicants due to the requirement to pass the code. This is a loss that the Amateur Radio community cannot sustain when all are needed as emergency communicators.

Recommendation:

Eliminate the code requirement for all classifications of licenses in the Amateur Service; retain all present CW sub-bands, current classes of licenses and ensure that current licensee do not loose any operating privileges nor should any licensee be upgraded without proper examination.

SUBMITTED ELECTRONICALLY

This 6th day of November, 2003

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